

UNITED STATES OF AMERICA
FOR THE DISTRICT OF MASSACHUSETTS

FILED
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MARY NOLAN

Plaintiff,

v.

BLUE CROSS AND BLUE SHIELD
OF MASSACHUSETTS, INC.

Defendant.

2004 JUN -3 A 11: 16

U.S. DISTRICT COURT
DISTRICT OF MASS
CIVIL ACTION
NO. 04-10944-RGS

**JOINT MOTION TO EXTEND PLAINTIFF'S TIME TO JUNE 19, 2004 THE
DEADLINE TO FILE RESPONSE TO DEFENDANT'S MOTION TO DISMISS.**

NOW COMES the parties, by and through their legal counsel, and hereby request that this Honorable Court extend the Plaintiff's time to file response to the Defendant's Motion to Dismiss and Request for Hearing until June 19, 2004. As grounds therefore the Parties state as follows:

1. The parties are in the process of attempting to resolve this matter; and
2. Attorney for the Plaintiff, L. Richard LeClair, III, is on business in California and needs time to respond to the Defendant's motion.

WHEREFORE, the parties pray that the Court allow this motion to allow the Plaintiff until June 19, 2004 to answer the Defendant's motion.

Respectfully submitted,
By the Plaintiff,
Mary Nolan,
By her attorney,

L. Richard LeClair, III (BBO#561650)
LeClair & LeClair, P.C.
135 Beaver Street 2nd Floor
Waltham, MA 02452
Tel: (781)893-5635
Fax: (781)647-9346

Respectfully submitted,
By the Defendant,
Blue Cross and Blue Shield of
Massachusetts, Inc.
By its attorney,

Sara A. Walker, (BBO#552116)
Blue Cross and Blue Shield of
Massachusetts, Inc.
Landmark Center
401 Park Drive
Boston, MA 02215-3326
Tel: (617)246-3500
Fax: (617)246-3550

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the within document was served upon the attorney of record for each party by mail/____.

Dated: 6/2/04